RESPONSE TO 1/28/86 CIL. GRANITECITY / REILLY TAR & CHEM

REILLY TAR & CHEMICAL CORPORATION

TELEPHONE: 618/452-3141 CABLE: RETAR INDIANAPOLIS



P. O. BOX 370 GRANITE CITY, ILLINOI?

EPA Region 5 Records Ctr.

February 5, 1986

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IEPA-DLPC

Mr. Mark Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Clinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Haney:

On 1-13-86 a split of groundwater samples and observation of sampling protocol (sampling inspection) was conducted at our Granite City plant. It was discovered the PH was not being collected under field conditions and is being analyzed at a contract laboratory. This is an apparent deficiency in the Sampling and Analysis plan of 35 Ill. Adm. Code Part 725, Subpart F and K. Also, we have an apparent violation in that we did not keep records of weekly inspections on our dike around the surface impoundment. This finding was from an inspection on January 16, 1986.

In regards to the PH not being collected under field conditions, we were unaware of this regulation. Several inspections and in approximately 1982 with IEPA personnel present inspecting our procedure, we split samples with the agency. There was no indication that we were not following the correct procedure. To comply with the regulations, we have on order a PH meter and this data will be collected in the field during our next sampling period.

The apparent violation of 35 Ill. Adm. Code 725.326 in regards to the weekly inspection of the surface impoundment including dikes and regetation surrounding the dike to detect any leaks, deterioration or failures in the impoundment; in actuality was being done. However, we failed to record this information in a log. We have started recording these inspections on a weekly basis on an inspection form.

Hopefully, these corrective actions are satisfactory. If you have any questions please call.

Sincerely,

REILLY TAR & CHEMICAL CORPORATION

Larry Pirtle, Manager Granite City Plant